



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: December 11, 2006
RE: Metallurgical Process Materials, LLC / 029-18433-00023
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 03/23/06



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Metallurgical Process Materials, LLC
133 Franklin Street
Aurora, Indiana 47001**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 029-18433-00023	
Issued by:	Issuance Date: December 11, 2006
Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Expiration Date: December 11, 2009

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
SECTION B	GENERAL CONDITIONS	6
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information[326 IAC 2-8-4(5)(E)]	
B.8	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.9	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]	
B.20	Source Modification Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	16
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Overall Source Limit [326 IAC 2-8]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.9	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.18 General Record Keeping Requirements.[326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS - Unit 1 through Unit 4..... 24

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Particulate Matter (PM₁₀) [326 IAC 2-8-4]
- D.1.2 Particulate Matter (PM) [326 IAC 6.5-1]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.5 Particulate Control
- D.1.6 Visible Emissions Notations
- D.1.7 Parametric Monitoring
- D.1.8 Broken or Failed Bag Detection
- D.1.9 Cyclone Inspections
- D.1.10 Cyclone Failure Detection

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.11 Record Keeping Requirements

Certification Form 28

Emergency Occurrence Form..... 29

Quarterly Deviation and Compliance Monitoring Report Form 31

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary custom blended metallurgical processing source.

Authorized individual:	Plant Manager
Source Address:	133 Franklin Street, Aurora, Indiana 47001
Mailing Address:	P.O Box 340, Aurora, Indiana 47001
General Source Phone:	812-926-3399
SIC Code:	3295
County Location:	Dearborn
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD rules Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Five (5) storage bins (#1 - #5), collectively identified as Unit 1, installed in 1990, each equipped with a bin vent filter for particulate control, exhausted to Stacks S1a through S1e, capacity: 20 tons of metallurgical aggregate per hour, total.
- (b) One (1) natural gas-fired rotary dryer, identified as Unit 2, installed in 1990, equipped with a baghouse, identified as S2, and cyclone for particulate control, exhausted to Stack S2, rated at 5.0 million British thermal units per hour, capacity: 10 tons of aggregate per hour.
- (c) One (1) material transfer and conveying area, identified as Unit 3, capacity: 20 tons of metallurgical aggregate per hour, consisting of:
 - (1) Three (3) product storage bins (#9, #10 and #12), each equipped with a bin vent filter for particulate control identified as S3a - S3c, exhausted to Stacks S3a through S3c.
 - (2) One (1) mixer, equipped with a bin vent filter for particulate control, identified as S3e, exhausted to Stack S3e.
 - (3) Two (2) load out bins (#11 and #14), each equipped with a bin vent filter for particulate control, identified as S3f and S3g, exhausted to Stacks S3f and S3g.
- (d) One (1) briquette load out bin (#13) and bucket elevator, identified as Unit 4, equipped with a baghouse, identified as S4, for particulate control, exhausted to Stack S4.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour, including:

- (a) One (1) natural gas-fired heater, identified as H3, installed in 1997, exhausted to Stack S5, rated at 0.100 million British thermal units per hour.
- (b) Two (2) natural gas-fired heaters, identified as H1 and H2, installed in 1992, exhausted to general ventilation, rated at 0.150 and 0.175 million British thermal units per hour, respectively.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

- (a) This permit, 029-18433-00023, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) an "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other

requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F 029-18433-00023 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the

applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOPsource is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in

accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the following plan submitted on July 11, 2006:

- (a) Travel surfaces within the plant are paved,
- (b) A sprinkling system has been installed along the plant's truck roadway to water roads as needed,
- (c) All road surfaces are swept on an as needed basis,
- (d) Log books documenting the sweeping and watering activities will be maintained,
- (e) Speed bumps have been installed on the plant's truck roadway and will be maintained to control speed,
- (f) Additional speed signs have been installed and will be maintained to control speed,
- (g) Screening inserts have been installed in the existing fence and shall be maintained to further minimize offsite transport of fugitive dust, and
- (h) All bulk materials that have the potential to create fugitive dust are stored within three-sided buildings or on paved pads under tarps when not in use.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ, of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ, approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements.[326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (d) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Metallurgical Processing

- (a) Five (5) storage bins (#1 - #5), collectively identified as Unit 1, installed in 1990, each equipped with a bin vent filter for particulate control, exhausted to Stacks S1a through S1e, capacity: 20 tons of metallurgical aggregate per hour, total.
- (b) One (1) natural gas-fired rotary dryer, identified as Unit 2, installed in 1990, equipped with a baghouse, identified as S2, and cyclone for particulate control, exhausted to Stack S2, rated at 5.0 million British thermal units per hour, capacity: 10 tons of aggregate per hour.
- (c) One (1) material transfer and conveying area, identified as Unit 3, capacity: 20 tons of metallurgical aggregate per hour, consisting of:
 - (1) Three (3) product storage bins (#9, #10 and #12), each equipped with a bin vent filter for particulate control identified as S3a - S3c, exhausted to Stacks S3a through S3c.
 - (2) One (1) mixer, equipped with a bin vent filter for particulate control, identified as S3e, exhausted to Stack S3e.
 - (3) Two (2) load out bins (#11 and #14), each equipped with a bin vent filter for particulate control, identified as S3f and S3g, exhausted to Stacks S3f and S3g.
- (d) One (1) briquette load out bin (#13) and bucket elevator, identified as Unit 4, equipped with a baghouse, identified as S4, for particulate control, exhausted to Stack S4.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM₁₀) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM₁₀ emissions shall not exceed the hourly rates expressed in the following table:

Emission Unit	Hourly PM₁₀ Limit (lbs/hr)
Storage Bins Unit 1	1.20
Rotary Dryer Unit 2	12.5
Material Transfer Unit 3	4.00
Briquette Load Out Unit 4	3.00

Compliance with the above limitations will render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1-2(a) (Nonattainment Area Limitations), particulate matter (PM) emissions from processes, identified as Units 1 through 4, shall not exceed 0.03 grains per dry standard cubic foot of exhaust air, each.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) To demonstrate compliance with Conditions D.1.1 and D.1.2, a PM and PM₁₀ stack test shall be performed at the one (1) natural gas fired rotary dryer, identified as Unit 2. The stack test shall be performed no later than August 13, 2008, which corresponds to five (5) years since the latest valid stack test, which was performed August 13, 2003, utilizing methods as approved by the Commissioner. PM₁₀ includes filterable and condensible PM₁₀. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) To demonstrate compliance with Conditions D.1.1 and D.1.2, a PM and PM₁₀ stack test shall be performed at the the one (1) bucket elevator for loading the briquette bin, which exhausts to stack 4. The stack test shall be performed no later than September 27, 2006, which corresponds to five (5) years since the latest valid stack test, which was performed September 27, 2001, utilizing methods as approved by the Commissioner. PM₁₀ includes filterable and condensible PM₁₀. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.5 Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2, the baghouses and cyclone for particulate control shall be in operation and control emissions from Units 2 and Unit 4 at all times that these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ, of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the Unit 1 through Unit 4 stack exhausts S1a through S1e, S2, S3a through S3c, S3e, S3f and S4 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the rotary dryer (Unit 2) and the briquette load out (Unit 4), at least once per day when any of the processes are in operation, as follows:

- (a) When for any one reading, the pressure drop across the baghouse, used in conjunction with the rotary dryer (Unit 2) is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) When for any one reading, the pressure drop across the baghouse, used in conjunction with briquette load out (Unit 4) is outside the normal range of 3.0 and 9.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (c) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.1.9 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone associated with rotary dryer (Unit 2) when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

D.1.10 Cyclone Failure Detection

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the Units 1 through 4 stack exhausts once per day.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records once per day of the pressure drop during normal operation.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.9.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Metallurgical Process Materials, LLC
Source Address: 133 Franklin Street, Aurora, Indiana 47001
Mailing Address: P.O. Box 340, Aurora, Indiana 47001
FESOP No.: F 029-18433-00023

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Metallurgical Process Materials, LLC
Source Address: 133 Franklin Street, Aurora, Indiana 47001
Mailing Address: P.O. Box 340, Aurora, Indiana 47001
FESOP No.: F 029-18433-00023

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Metallurgical Process Materials, LLC
 Source Address: 133 Franklin Street, Aurora, Indiana 47001
 Mailing Address: P.O. Box 340, Aurora, Indiana 47001
 FESOP No.: F 029-18433-00023

Months: _____ to _____ Year: _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name: Metallurgical Process Materials, LLC
Source Location: 133 Franklin Street, Aurora, Indiana 47001
County: Dearborn
FESOP: F 029-18433-00023
SIC Code: 3295
Permit Reviewer: Frank P. Castelli

On September 21, 2006, the Office of Air Quality (OAQ) had a notice published in the Journal Press Aurora Indiana, stating that Metallurgical Process Materials, LLC (formerly known as Oxbow Carbon & Minerals LLC) had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a custom blended metallurgical processing source. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On October 18, 2006, Dennis Wheeland, Plant Manager of Metallurgical Process Materials, submitted comments on the proposed FESOP. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Conditions B.15 and C.19

These conditions require Metallurgical Process Materials, LLC to submit a Quarterly Deviation and Compliance Monitoring Report. Under the previous permit, such reports were required semiannually. Metallurgical Process Materials, LLC believes that the requirement to now report deviations quarterly represents a manpower burden to file additional reports which are not warranted. Metallurgical Process Materials, LLC requests that this condition be revised to require deviation and compliance monitoring reports on a semiannual basis, rather than quarterly.

Response 1:

IDEM OAQ requires that the Deviation and Compliance Monitoring reports be submitted quarterly in order to assure continuous compliance with all applicable provisions of the permit. 326 IAC 2-7-5(3) states that the Part 70 permits must include: "Monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements." This provision goes on to clearly identify that any existing requirements establish minimum requirements for the compliance monitoring provision of the permit. Therefore, no changes have been made to the Conditions B.15 and C.19 as a result of this comment.

Comment 2:

Condition C.9

This condition requires that stack test protocols be submitted at least 35 days prior to the date of intended testing. Metallurgical Process Materials, LLC requests that this condition also stipulate that the Office of Air Quality (OAQ) will acknowledge such notifications within 10 days of receipt, and that the failure to acknowledge within this timeframe will indicate that the proposed test dates and procedures are acceptable to OAQ. Given the difficulty in scheduling testing and the costs associated with rescheduling of tests, Metallurgical Process Materials, LLC believes that such stipulations are reasonable to minimize economic impacts associated with changes to proposed testing.

Response 2:

IDEM OAQ recommends that Metallurgical Process Materials, LLC make a formal request on the protocol and/or the protocol cover letter asking for an acknowledgement. If there are any concerns regarding the submitted protocol please contact the Compliance Data Section at 317 232-8443.

Comment 3:

Condition C.14

This condition requires that Metallurgical Process Materials, LLC complete and submit an Emergency Reduction Plan to IDEM within 90 days of the date of permit issuance. Metallurgical Process Materials, LLC requests that this condition also stipulate that such plans will be deemed complete unless OAQ indicates within 30 days of receipt that additional information is necessary.

Response 3:

Unless IDEM, OAQ disapproves the Emergency Reduction Plan (ERP), Metallurgical Process Materials, LLC shall comply with the terms of the Plan. If IDEM, OAQ disapproves the ERP in writing, the Permittee shall be granted an additional thirty (30) days to resolve the deficiencies and submit an approvable ERP. Therefore, no changes to Condition C.14 have been made due to this comment.

Comment 4:

Condition D.1.7

This condition requires daily inspections "to verify the placement, integrity and particle loading of the bin vent filters associated with Unit 1 and Unit 3". In Condition D.1.6, Metallurgical Process Materials, LLC is required to perform daily visible emission evaluations of the exhaust from several units, including Unit 1 and Unit 3. Metallurgical Process Materials, LLC concludes, therefore, that Condition D.1.7 is intended to require some sort of daily inspection of the filters for these units in addition to performing visible emission evaluations. Based on the wording of this condition, Metallurgical Process Materials, LLC believes that the only way to satisfy this requirement is to perform internal visual checks of the integrity of the filters each day. Because these filters are located on the top of material storage bins, physical inspection of the filters on a daily basis represent a safety hazard for Metallurgical Process Materials, LLC employees. The location of bin vent filters is such that it is unsafe to attempt access to these units during inclement weather. Metallurgical Process Materials, LLC believes that visual emission evaluations of vent exhausts should be adequate to verify that units are operating in an acceptable manner, and requests that this condition be removed from the proposed permit.

Response 4:

IDEM, OAQ agrees that safety hazards will be present in inclement weather. Therefore, the requirement to inspect the bin vent filters on a daily basis is not prudent. Since IDEM, OAQ is requiring the source to perform daily visible notations of the stack exhausts Condition D.1.7 and the associated record keeping requirement in Condition D.1.12(b) have been deleted as follows:

D.1.7 Monitoring

~~Daily inspections shall be performed to verify the placement, integrity and particle loading of the bin vent filters associated with Unit 1 and Unit 3. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~

D.1.7 ~~D.1.8~~ Parametric Monitoring

D.1.8 ~~D.1.9~~ Broken or Failed Bag Detection

D.1.9 ~~D.1.10~~ Cyclone Inspections

D.1.10 ~~D.1.11~~ Cyclone Failure Detection

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.11 ~~D.1.12~~ Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the Units 1 through 4 stack exhausts once per day.
- ~~(b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of the daily inspections performed to verify the placement, integrity and particle loading of the bin vent filters associated with Unit 1 and Unit 3.~~
- (b)(e)** To document compliance with Condition **D.1.7** ~~D.1.8~~, the Permittee shall maintain records once per day of the pressure drop during normal operation.
- (c)(d)** To document compliance with Condition **D.1.9** ~~D.1.10~~, the Permittee shall maintain records of the results of the inspections required under Condition **D.1.9** ~~D.1.10~~.
- (d)(e)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 5:

Condition D.1.8

This condition requires that pressure drop readings be recorded once per day for the rotary dryer and briquette load out unit. The previous permit for Metallurgical Process Materials, LLC required such records once per week, rather than once per day. Metallurgical Process Materials, LLC does not believe it is necessary for pressure drop readings to be collected once per day in order to assure that equipment operates properly. Metallurgical Process Materials, LLC did not identify pressure drop abnormalities while performing once per week recordings as required under its previous permit. The requirement to perform such monitoring once per day represents a burden on resources for the plant. Metallurgical Process Materials, LLC requests that this condition be revised to require such records once per week, consistent with previous permit conditions.

Response 5:

The requirement to record pressure drop readings once per week in the past has been deemed by IDEM, OAQ to be not adequate to ensure continuous compliance with the FESOP. Daily records, therefore, will alert the Permittee if something goes amiss within a day, rather than within a period that could have been as long as thirteen (13) days. Therefore, Condition D.1.8 (now Condition D.1.7) has not been revised as requested.

On October 13, 2006, Donald and Sandra Lowe, residents of Aurora, submitted a comment on the proposed FESOP. The comment is as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 6:

We have made so many complaints to EPA but nothing is ever done. Our property and vehicles are covered in sand. We have talked to several people over the past years and are always told "There is nothing we can do unless we see it coming across the street." You can't see it if you are not down here. Once in awhile someone is really interested in helping to get the problem solved but it usually ends up going nowhere. They come down a few times and talk to everyone but then nothing happens. You don't get phone calls returned either. By the time you finally do get someone, you have to start all over again. No one pays attention to what keeps happening or seems to care either.

Now they want to run 24 hours a day seven days a week. Enough is Enough. You can't even sit outside without getting sand all over you. When you talk to someone about it, they think its not a problem. The employees wear face masks sometimes. If the people in the neighborhood can breathe it why can't the employees. It's not supposed to be bad for you, right? Also the noise is really bad. I know your letter stated to contact your local officials. That's a laugh. One of the neighbors asked the mayor what could be done and his answer was "Sell your house and move". This was stated in the local newspaper regarding comments made at a council meeting. I have the newspaper. I would like to know who would be willing to move here? And why should we be the ones to move anyway? We were here way before that company moved in. We have lived in this neighborhood for 23 years. Not that anyone seems to think that matters. We probably wouldn't get enough out of our place to buy another one once people see the sand. Why is it so hard to get the sand under control? We keep getting told to "just hang in there for a while longer". This has been said so many times it doesn't mean anything.

We have no idea what PM and PM₁₀, NO_x, etc. is. It would be nice if it was explained to everyone face to face and in plain English. You would also find out how others feel.

Response 6:

This federally enforceable operating permit (FESOP) has more stringent monitoring requirements than the minor source operating permit (MSOP) currently held by the Permittee. The FESOP requires daily visible emission notations and daily, rather than weekly, pressure drop measurements. This FESOP permit will require more frequent inspections by the IDEM inspector. This will enable IDEM to monitor the source's operations more closely.

IDEM OAQ appreciates your concerns regarding the effect that the operation of this source will have on the air quality of the region. IDEM, OAQ, defines PM as particulate matter which means any airborne finely divided solid or liquid material, excluding uncombined water, with an aerodynamic diameter smaller than one hundred (100) micrometers. These are relatively large particles which are normally kept out of human body by the body's natural defenses, such coughing and sneezing. These larger particles generally do not get past the throat and nose and do not enter the lungs.

PM₁₀ means any particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers. For comparison purposes, the diameter of a human hair is approximately 70 micrometers. PM_{2.5} means particulate matter with an aerodynamic diameter less than or equal to a nominal two and five-tenths (2.5) micrometers. Particles in the range of 2.5 to 10 micrometers are referred to as coarse particles and may enter the lungs. An example of coarse particles are those particles found near roadways. Particles smaller in diameter than 2.5 micrometers are fine particles and are generally found in smoke and haze.

At Metallurgical Process Materials, LLC the remainder of the pollutants, NO_x (nitrogen oxides), SO₂ (sulfur dioxides), VOC (volatile organic compounds) and CO (carbon monoxide), in addition to particulate matter, are by-products of the combustion of natural gas in a rotary dryer and three (3) space heaters. Natural gas is one of the cleanest fuel compared to fuel oil and coal. If natural gas is used for heating or cooking in your house, these same pollutants are produced. A natural gas-fired

furnace in a typical single family house can burn approximately the same amount of natural gas as each of the three (3) space heaters.

IDEM OAQ understands your concerns regarding noise and the effect the plant may have on property values but IDEM OAQ does not have any legal authority to address these concerns. For such issues, please contact your local officials.

The concentrations of air pollutants, such as particulate matter, are often significantly higher inside the plant than they are in the ambient air beyond the plant boundaries. Therefore, the use of face masks and other safety measures by the plant employees are required by OSHA regulations that protect the health and safety of the employees. These higher levels of air pollutants do not affect the general population outside the boundaries of the plant site.

Metallurgical Process Materials, LLC currently operates two (2) 10-hour shifts during weekdays and when needed they operate 6 to 8 additional hours on Saturdays and Sundays. The source does not have any plans to begin operating 24 hours per day seven (7) days per week. This schedule does not reflect a change in their operating schedule nor does the current or proposed permit limit the number of hours of operation. The potential to emit calculations conservatively assumed that the source operates every hour of the year (8,760 hours) at maximum capacity, whereas the actual emissions will be less.

Metallurgical Process Materials, LLC will be required to comply with all the applicable conditions of the proposed Federally Enforceable State Operating Permit (FESOP). This includes both federally enforceable limits on particulate matter emissions from stacks and vents and provisions to address all fugitive emissions.

Regarding the non-fugitive, point source emissions, Metallurgical Process Materials, LLC will have to comply with the specific pound per hour limits in Condition D.1.1 (abstracted from the proposed permit below) and the particulate grain loading limitation in Condition D.1.2 (abstracted from the proposed permit below). The source will be required to conduct stack testing specified in Condition D.1.4 to verify compliance with both conditions. Condition D.1.5 mandates that all control devices (baghouses and cyclone) be continuously operated when their associated processes are in operation.

Regarding possible fugitive emissions, such as sand and dust, this source is subject to requirements of 326 IAC 6-4 and 326 IAC 6-5. Fugitive dust is defined as particulate matter composed of soil, which is uncontaminated by pollutants resulting from industrial activities. Fugitive dust may include emissions from paved and unpaved roads, wind erosion of exposed soil surfaces and soil storage piles and other activities. Fugitive dust emissions means the generation of particulate matter to the extent that some portion of the material escapes the property lines. Therefore, the Conditions C.5 and C.6 (abstracted from the proposed permit below) are included in the permit and the source will be required to comply with these fugitive emission conditions:

D.1.1 Particulate Matter (PM₁₀) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM₁₀ emissions shall not exceed the hourly rates expressed in the following table:

Emission Unit	Hourly PM₁₀ Limit (lbs/hr)
Storage Bins Unit 1	1.20
Rotary Dryer Unit 2	12.5
Material Transfer Unit 3	4.00
Briquette Load Out Unit 4	3.00

D.1.2 Particulate Matter (PM) [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1-2(a) (Nonattainment Area Limitations), particulate matter (PM) emissions from processes, identified as Units 1 through 4, shall not exceed 0.03 grains per dry standard cubic foot of exhaust air, each.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the following plan submitted on July 11, 2006:

- (a) Travel surfaces within the plant are paved,
- (b) A sprinkling system has been installed along the plant's truck roadway to water roads as needed,
- (c) All road surfaces are swept on an as needed basis,
- (d) Log books documenting the sweeping and watering activities will be maintained,
- (e) Speed bumps have been installed on the plant's truck roadway and will be maintained to control speed,
- (f) Additional speed signs have been installed and will be maintained to control speed,
- (g) Screening inserts have been installed in the existing fence and shall be maintained to further minimize offsite transport of fugitive dust, and
- (h) All bulk materials that have the potential to create fugitive dust are stored within three-sided buildings or on paved pads under tarps when not in use.

Furthermore, records shall be kept and maintained which document all control measures and activities to be implemented in accordance with the approved control plan. The records shall be available upon the request of the commissioner, and shall be retained for three (3) years.

If any member of the public observes fugitive dust crossing the property lines or if you suspect that Metallurgical Process Materials, LLC is out of compliance with any of the applicable regulations, please contact the IDEM inspector, Cynthia Luxford, at 317 234-3996 or at (800) 451-6027 from 8:15 a.m. to 4:45 p.m.

In addition, in order to minimize particulate matter emissions, including sand, the proposed permit contains compliance monitoring provisions, such as visible emission notations of all stack exhausts and the monitoring of parameters that insure the proper operation of the required control devices. The proposed permit increases the frequency of the compliance monitoring requirements for the control devices (baghouses) from weekly to daily and this, along with the increased record keeping requirements, will allow the IDEM inspector to determine, if there are any violations of these permit conditions. The compliance monitoring conditions in the proposed permit are as follows:

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.5 Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2, the baghouses and cyclone for

particulate control shall be in operation and control emissions from Units 2 and Unit 4 at all times that these facilities are in operation.

- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ, of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the Unit 1 through Unit 4 stack exhausts S1a through S1e, S2, S3a through S3c, S3e, S3f and S4 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the rotary dryer (Unit 2) and the briquette load out (Unit 4), at least once per day when any of the processes are in operation, as follows:

- (a) When for any one reading, the pressure drop across the baghouse, used in conjunction with the rotary dryer (Unit 2) is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) When for any one reading, the pressure drop across the baghouse, used in conjunction with briquette load out (Unit 4) is outside the normal range of 3.0 and 9.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be

considered a deviation from this permit.

- (c) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.1.9 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone associated with rotary dryer (Unit 2) when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

D.1.10 Cyclone Failure Detection

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

IDEM generates a schedule that determines when the inspector will visit the source. Inspector visits are unannounced. The IDEM would take enforcement actions if Metallurgical Process Materials, LLC were to be found to be in violation of any conditions in this FESOP.

Upon further review, the OAQ has decided to make the following change to the FESOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

The name of the source has been changed from Oxbow Carbon & Minerals LLC to Metallurgical Process Materials, LLC throughout the permit.

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a
Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name:	Oxbow Carbon & Minerals LLC
Source Location:	133 Franklin Street, Aurora, IN 47001
County:	Dearborn
SIC Code:	3295
MSOP Permit No.:	029-11447-00023
MSOP Permit Issuance Date:	August 16, 2000
FESOP Permit No.:	F 029-18433-00023
Permit Reviewer:	Frank P. Castelli

The Office of Air Quality (OAQ) has reviewed a FESOP application from Oxbow Carbon & Minerals LLC (formerly known as Applied Industrial Materials Corporation) relating to the operation of a stationary custom blended metallurgical processing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Five (5) storage bins (#1 - #5), collectively identified as Unit 1, installed in 1990, each equipped with a bin vent filter for particulate control, exhausted to Stacks S1a through S1e, capacity: 20 tons of metallurgical aggregate per hour, total.
- (b) One (1) natural gas-fired rotary dryer, identified as Unit 2, installed in 1990, equipped with a baghouse, identified as S2, and cyclone for particulate control, exhausted to Stack S2, rated at 5.0 million British thermal units per hour, capacity: 10 tons of aggregate per hour.
- (c) One (1) material transfer and conveying area, identified as Unit 3, capacity: 20 tons of metallurgical aggregate per hour, consisting of:
 - (1) Three (3) product storage bins (#9, #10 and #12), each equipped with a bin vent filter for particulate control, identified as S3a - S3c, exhausted to Stacks S3a through S3c.
 - (2) One (1) mixer, equipped with a bin vent filter for particulate control, identified as S3e, exhausted to Stack S3e.
 - (3) Two (2) load out bins (#11 and #14), each equipped with a bin vent filter for particulate control, identified as S3f and S3g, exhausted to Stacks S3f and S3g.
- (d) One (1) briquette load out bin (#13) and bucket elevator, identified as Unit 4, equipped with a baghouse, identified as S4, for particulate control, exhausted to Stack S4.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour, including:

- (a) Two (2) natural gas-fired heaters, identified as H1 and H2, installed in 1992, exhausted to general ventilation, rated at 0.150 and 0.175 million British thermal units per hour, respectively.
- (b) One (1) natural gas-fired heater, identified as H3, installed in 1997, exhausted to Stack S5, rated at 0.100 million British thermal units per hour.

Existing Approvals

The source has been operating under the previous MSOP 029-11447-00023, issued on August 16, 2000, and the following amendments and revisions:

- (a) MPR 029-13867-00023 issued on April 3, 2001;
- (b) Notice Only Change 029-14463-00023 issued on July 24, 2001; and
- (c) Notice Only Change 029-14817-00023 issued on September 18, 2001.

All conditions from previous approvals were incorporated into this FESOP except the following:

MSOP 029-11447-00023 issued on August 16, 2000.

Condition D.1.5 (b), Testing Requirements.

Reason not incorporated: The required testing of Unit 3 is no longer applicable because testing is technically not feasible. The test was required to confirm the PM₁₀ emission factors for this unit, which was necessary to demonstrate that the source was an MSOP source. Since this test is not feasible, the Permittee is now required to obtain either a Part 70 Operating Permit or a FESOP. The Permittee has elected to receive a FESOP.

Air Pollution Control Justification as an Integral Part of the Process

The following justification was incorporated into this permit from the MSOP 029-11447-00023 issued on August 16, 2000:

The former company submitted the following justification such that the baghouse and cyclone on Unit 2 were considered as an integral part of the drying process.

The primary purpose of the cyclone and baghouse on the rotary dryer is to remove fines from the process material before the material reaches the burner end of the dryer so that the fines are not overheated. Removing the fines is essential to providing a product with the physical and chemical characteristics demanded by the customers. Thus, the primary purpose of this equipment is not to control air pollution.

IDEM, OAQ evaluated the justifications and agreed that the cyclone and baghouse is considered as an integral part of the drying process. Therefore, the permitting level will be determined using the potential to emit after the cyclone and baghouse. Operating conditions in the proposed FESOP will specify that this cyclone and baghouse shall operate at all times when the drying process is in operation.

Enforcement Issue

- (a) IDEM is aware that equipment has been operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the heading *Permitted Emission Units and Pollution Control Equipment*.

Although the Permittee was required to do a stack test by August 16, 2003 to verify that this source was not subject to the requirements of the Part 70 Operating Program, the Permittee determined that it was not possible to do the stack test. Therefore, the Permittee should have submitted a Part 70 Operating Permit or a FESOP application by this date.

The source did not submit a Part 70 Operating Permit or FESOP application by August 16, 2003.

- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on December 1, 2003. Additional information was received on November 22, 2004, November 28, 2005 and July 11, 2006.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 6 of 6 of Appendix A of this document for detailed emission calculations.

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	242
PM ₁₀	242
SO ₂	0.014
VOC	0.131
CO	2.00
NO _x	2.38

HAPs	Potential to Emit (tons/yr)
Benzene	0.00005
Dichlorobenzene	0.00003
Formaldehyde	0.002
Hexane	0.043
Toluene	0.00008
Lead	0.00001
Cadmium	0.00003
Chromium	0.00003
Manganese	0.000009
Nickel	0.00005
Total	0.045

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source has opted to obtain a FESOP. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Storage Bins Unit 1	0.563	5.26	--	--	--	--	--
Rotary Dryer Unit 2	9.01	54.8	0.013	0.120	1.84	2.19	0.041
Material Transfer Unit 3	0.563	17.5	--	--	--	--	--
Briquette Load Out Unit 4	4.92	13.1	--	--	--	--	--
Insignificant Activities	0.004	0.014	0.001	0.010	0.156	0.186	0.004
Total Emissions	15.1	90.7	0.014	0.130	2.00	2.35	0.045

Notes:

- (a) The PM values for Units 1 through 4 reflect the allowable emissions pursuant to 326 IAC 6.5-1 of 0.03 grains per dry standard cubic foot of outlet air.
- (b) The PM₁₀ values for Units 1 through 4 are equivalent to 1.20, 12.5 total, 4.00, and 3.00 pounds per hour, respectively, and reflect the source-wide emission rates to comply with the requirements of 326 IAC 2-8-4. These specific limits were requested by the source to allow for operational flexibility.

County Attainment Status

The source is located in Dearborn County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	*attainment
CO	attainment

*Note Aurora is not located in Lawrenceburg Township, which is the nonattainment area for the 8-hour ozone standard.

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Dearborn County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Dearborn County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Dearborn County, outside of Lawrenceburg Township, has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	5.44
PM ₁₀	5.57
SO ₂	0.014
VOC	0.130
CO	2.00
NO _x	2.35
Single HAP	Less than 10
Combination HAPs	Less than 25

This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

- (a) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.670, Subpart OOO, because in the definition of a Nonmetallic Mineral Processing facility, the processing of nonmetallic minerals must include crushing or grinding.

In the revisions to Subpart OOO, published in the June 9, 1997 Federal Register on page 31354, the comments section specifically clarifies that EPA did not intend to regulate stand-alone screening operations at plants that have no crushers. Sources that do not employ crushing or grinding, by definition, are not considered nonmetallic mineral processing plants and thus are not subject to the requirements of NSPS Subpart OOO.

Therefore, since this source only colors and packages aggregate, the requirements of NSPS Subpart OOO are not included in this permit.

- (b) There are no other New Source Performance Standards included in the permit for this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this minor source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The unrestricted potential to emit of PM and PM₁₀ is less than two-hundred fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Dearborn County, and is required to obtain a Federally Enforceable State Operating Permit (FESOP). Pursuant to 326 IAC 2-6, since this source is not required to have an operating permit under 326 IAC 2-7, is not located in Lake or Porter counties with the potential to emit VOC greater than twenty-five (25) tons per year, and does not have the potential to emit lead of greater than or equal to five (5) tons per year, the requirements of this rule do not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM₁₀ shall be limited to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

The PM₁₀ emissions from the significant emission units will be limited to ninety and seven tenths (90.7) tons per year. Thus, the requirements of 326 IAC 2-7 are not applicable. This limitation was chosen to allow for future expansion. In order to make this limitation federally enforceable, each significant emission unit will be assigned an hourly PM₁₀ emission limit. Given that the plant could potentially operate 8,760 hours per year, the following hourly limits will ensure that the PM₁₀ emissions from this source are less than the Part 70 thresholds:

Emission Unit	Hourly PM₁₀ Limit (lbs/hr)	Equivalent Emission Rate (tons/yr)
Storage Bins Unit 1	1.20	5.26
Rotary Dryer Unit 2	12.5	54.8
Material Transfer Unit 3	4.00	17.5
Briquette Load Out Unit 4	3.00	13.1
Total		90.7

Based on information in the application and the calculations provided on page 1 of TSD Appendix A, the source can be in compliance with the above limits. Therefore, the requirements of 326 IAC 2-7 are not applicable.

326 IAC 5-1 (Opacity Limitations)

This source is located in Aurora, which is not part of Lawrenceburg Township in Dearborn County. Therefore, pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The potential to emit a single HAP is less than ten (10) tons per year and the potential to emit a combination of HAPs is less than twenty-five (25) tons per year. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the following plan submitted on July 11, 2006:

- (a) Travel surfaces within the plant are paved,
- (b) A sprinkling system has been installed along the plant's truck roadway to water roads as needed,
- (c) All road surfaces are swept on an as needed basis,
- (d) Log books documenting the sweeping and watering activities will be maintained,
- (e) Speed bumps have been installed on the plant's truck roadway and will be maintained to control speed,
- (f) Additional speed signs have been installed and will be maintained to control speed,
- (g) Screening inserts have been installed in the existing fence and shall be maintained to further minimize offsite transport of fugitive dust, and
- (h) All bulk materials that have the potential to create fugitive dust are stored within three-sided buildings or on paved pads under tarps when not in use.

326 IAC 6.5-1 (Nonattainment Area Limitations)

This source is subject to the requirements of 326 IAC 6.5-1-2 because the source is located in Dearborn County, which is one of the specifically listed counties under 326 IAC 6.5-1-7 and has potential particulate matter emissions greater than one hundred (100) tons per year. Pursuant to 326 IAC 6.5-1-2 (Nonattainment Area Limitations), the particulate from each exhaust point associated with the storage bins (Unit 1), the rotary dryer (Unit 2), material transfer (Unit 3) and briquette load-out (Unit 4) shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

Testing Requirements

- (a) In order to demonstrate compliance with 326 IAC 2-8-4 (FESOP) and 326 IAC 6.5-1-2 (Nonattainment Area Limitations), a PM and PM₁₀ stack test is required at the one (1) natural gas fired rotary dryer (Unit 2). The stack test shall be performed no later than August 13, 2008, which corresponds to five (5) years since the latest valid stack test, which was performed August 13, 2003.

- (b) In order to demonstrate compliance with 326 IAC 2-8-4 (FESOP) and 326 IAC 6.5-1-2 (Nonattainment Area Limitations), a PM and PM₁₀ stack test is required at the one (1) bucket elevator for loading the briquette bin (Unit 4) which exhausts to Stack S4. The stack test shall be performed no later than September 27, 2006, which corresponds to five (5) years since the latest valid stack test, which was performed September 27, 2001.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The five (5) storage bins, identified as Unit 1, have applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the Unit 1 stack exhausts S1a through S1e shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (2) Daily inspections shall be performed to verify the placement, integrity and particle loading of the five (5) Unit 1 bin vent filters. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The natural gas-fired rotary dryer, identified as Unit 2, has applicable compliance monitoring conditions as specified below:

- (1) Visible emission notations of the Unit 2 stack exhaust S2 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (2) The Permittee shall record the pressure drop across the baghouse controlling Unit 2 at least once per day when Unit 2 is being utilized when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (3) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (4) An inspection shall be performed each calendar quarter of all cyclones controlling the rotary drying operations when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.
- (5) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the rotary dryer. Operations may continue only

if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (c) The one (1) material transfer and conveying area, identified as Unit 3, has applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the Unit 3 stack exhausts S3a through S3c and S3e and S3f shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (2) Daily inspections shall be performed to verify the placement, integrity and particle loading of the six (6) Unit 3 bin vent filters. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (d) The one (1) briquette load out bin (#13) and bucket elevator, identified as Unit 4 has applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the one (1) briquette load out bin (#13) and bucket elevator stack exhaust S4 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (2) The Permittee shall record the pressure drop across the baghouse controlling the bucket elevator for loading the Briquette bin when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 9.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure

reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (3) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the bin vent filters, baghouses and cyclone, for the custom blended metallurgical processing operations, must operate properly to ensure compliance with 326 IAC 5-1, 326 IAC 6-4, 326 IAC 6.5-1 and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this custom blended metallurgical processing source shall be subject to the conditions of the FESOP 029-18433-00023.

**Appendix A: Emission Calculations
Dust Control Operations**

Company Name: Oxbow Carbon & Minerals LLC
Address City IN Zip: 133 Franklin Street, Aurora, Indiana 47001
FESOP: F 029-18433
Pit ID: 029-00023
Reviewer: Frank P. Castelli
Application Date: December 1, 2003

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
S1	99.0%	0.020	500.0	8.6	37.54	0.086	0.38
S2	99.0%	0.010	8000.0	N/A	N/A	0.686	3.00
S3	99.0%	0.020	500.0	8.6	37.54	0.086	0.38
S4	99.0%	0.010	4364.0	37.4	163.84	0.374	1.64
Total:					241.9		5.39

Note: Control Device is Integral to the Process at S2 and S1 and S3 are bin filters while S2 and S4 are baghouses

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Oxbow Carbon & Minerals LLC
Address City IN Zip: 133 Franklin Street, Aurora, IN 47001
FESOP: F 029-18433
Plt ID: 029-00023
Reviewer: Frank P. Castelli
Application Date: December 1, 2003

Rotary Dryer

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

5.00

44

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.042	0.166	0.013	2.19	0.120	1.84

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

HAPs Emissions

Company Name: Oxbow Carbon & Minerals LLC
Address City IN Zip: 133 Franklin Street, Aurora, IN 47001
Permit Number: F 029-18433
Plt ID: 029-00023
Reviewer: Frank P. Castelli
Application Date: December 1, 2003

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.075	Hexane 1.8	Toluene 0.0034
Potential Emission in tons/yr	0.00005	0.00003	0.00164	0.03942	0.00007

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.00038	Nickel 0.0021	Total
Potential Emission in tons/yr	0.00001	0.00002	0.00003	0.00001	0.00005	0.041

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Oxbow Carbon & Minerals LLC
Address City IN Zip: 133 Franklin Street, Aurora, IN 47001
Permit Number: 029-18433
Plt ID: 029-00023
Reviewer: Frank P. Castelli
Application Date: December 1, 2003

3 Heaters (H1 - H3) @ 0.150, 0.175 & 0.100

Insignificant Combustion

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.425

3.723

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.004	0.014	0.001	0.186	0.010	0.156

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 5 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

HAPs Emissions

Company Name: Oxbow Carbon & Minerals LLC
Address City IN Zip: 133 Franklin Street, Aurora, IN 47001
Permit Number: 029-18433
Plt ID: 029-00023
Reviewer: Frank P. Castelli
Application Date: December 1, 2003

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.075	Hexane 1.8	Toluene 0.0034
Potential Emission in tons/yr	0.000004	0.000002	0.00014	0.00335	0.00001

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.00038	Nickel 0.0021	Total
Potential Emission in tons/yr	0.000001	0.000002	0.000003	0.000001	0.000004	0.004

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Dust Control Operations**

**Company Name: Oxbow Carbon & Minerals LLC
Address City IN Zip: 133 Franklin Street, Aurora, Indiana 47001
FESOP: F 029-18433
Plt ID: 029-00023
Reviewer: Frank P. Castelli
Application Date: December 1, 2003**

Unit ID	Control Efficiency (%)	Allowable Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Allowable Emission Rate (lb/hr)	Allowable Emission Rate (tons/yr)
S1	99.0%	0.030	500.0	0.129	0.563
S2	99.0%	0.030	8000.0	2.06	9.01
S3	99.0%	0.030	500.0	0.129	0.563
S4	99.0%	0.030	4364.0	1.12	4.92

Allowable Emission Rate Pursuant to 6.5-1

Note: S1 and S3 are bin vent filters and S2 and S4 are baghouses.

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)